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September 14, 2016

Honorable Lewis A. Kaplan  
United States District Judge  
United States District Court  
500 Pearl Street  
New York, New York 10007

Re: U.S. v. Sean McIntosh,  
16 Cr. 212(LAK)

Dear Judge Kaplan:

I represent Sean McIntosh in the above captioned case pursuant to the Criminal Justice Act. I write to respectfully request that Your Honor authorize the assignment of an associate attorney to assist me in this case. Discovery is massive. Discovery includes video and audio recordings and Title III discovery. In order to effectively review all the wire tap evidence, the use of an associate attorney will be necessary. An associate will also assist in meeting with the client to review the extensive discovery, as well as assist with legal research and drafting of potential pre-trial motions.

Subject to the Court's approval I believe at least 100 hours at \$90 per hour would be appropriate. If additional hours are necessary I will apply to the Court for the assignment of those hours.

Thank you for your consideration of this request.

Respectfully yours,  
/s/  
Thomas F. X. Dunn